

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION**

THE GENERAL LAND OFFICE OF  
THE STATE OF TEXAS, et al.,

Plaintiffs,

**V.**

JOSEPH R. BIDEN, in his official capacity as President of the United States of America, et al.,

Defendants.

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Civil Action No. 7:21-CV-00272

THE STATE OF MISSOURI; and  
THE STATE OF TEXAS,

Plaintiffs,

**V.**

JOSEPH R. BIDEN, in his official capacity as President of the United States of America, et al.,

Defendants.



Civil Action No. 7:21-CV-00420  
(formerly No. 6:21-cv-00052)

**UNOPPOSED MOTION TO EXCEED WORD LIMIT FOR CONSOLIDATED  
REPLY IN SUPPORT OF DIAMOND A RANCH, WESTERN DIVISION L.L.C. AND  
GUADALUPE RANCH CORPORATION MOTION TO INTERVENE**

Proposed Defendants-Intervenors Diamond A Ranch, Western Division L.L.C. and Guadalupe Ranch Corporation (together, “the Ranch” or “Proposed Intervenors”) filed a motion to intervene in this case on April 11, 2024. ECF No. 154. The parties filed responses on May 10, 2024, ECF Nos. 184, 185, with each brief extended to 8,000 words. ECF No. 178. According to the Court’s procedures, the Ranch Intervenors’ reply to the parties’ responses is

due on May 17, 2024. *See* Court Procedures Rule 16.c. The Ranch Intervenorers intend to respond to the Plaintiffs' and Defendants' responses in one consolidated reply of no more than 3,500 words. The parties will not be prejudiced by this request, and they do not object to the requested word- limit extension. Similarly, proposed intervenors Sierra Club, Texas Sterling, Southern Border Constructions, and RKE Contractors do not object to the asked for word-limit extension.

The Court should grant the Ranch Intervenorers' requested word-limit extension for the preceding reasons. A proposed order is attached.

Date: May 16, 2024

Respectfully submitted,

**STEPTOE LLP**

s/ Larry R. Veselka

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***Attorneys for Diamond A Ranch, Western Division  
L.L.C. and Guadalupe Ranch Corporation***

**CERTIFICATE OF CONFERENCE**

I hereby certify that on May 16, 2024, I communicated with counsel for Defendants, Plaintiffs, and all other proposed intervenors in this action to request their position on the relief sought in this motion. All parties and proposed intervenors consent to this motion.

/s/ Larry R. Veselka

Larry R. Veselka

**CERTIFICATE OF WORD COUNT**

I certify that the total number of words in this motion, exclusive of the matters designated for omission, is 162, as counted by Microsoft Word.

/s/ Larry R. Veselka

Larry R. Veselka

**CERTIFICATE OF SERVICE**

I hereby certify that on May 16, 2024, I electronically filed a copy of the foregoing motion. Notice of this filing will be sent via email to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

/s/ Larry R. Veselka

Larry R. Veselka